

November 1, 2023

U.S. Department of Justice Office of the Pardon Attorney 950 Pennsylvania Ave. NW Washington, DC 20530

Dear President Biden,

My name is Kandel Cornwall, I'm writing to you today on behalf of my brother Robert Panton. My parents had four children, three girls and one boy(Robert). They did not have much, but were able to put all of us through school, so we could make a difference in society. Robert is loving, kind and smart. He has always supported me throughout my life. He is always the one I turned to growing up.

Robert was always my biggest fan and cheerleader. During my junior high school days when I had afterschool volleyball competitions it was my brother Robert who showed up to cheer me on. During my middle school days, I would be the host for talent shows and Robert would always help me rehearse. Robert was always my biggest supporter.

Unfortunately, he made some terrible choices along the way that led him to being incarcerated. When Robert was in prison, I visited Robert as often as I possible could, and during those visits we had long conversations about those choices, and how Robert wished he would have stayed on the same path that my sisters and I had continued on. I have seen the growth in Robert and feel he has been rehabilitated. He demonstrates that just because you fall down you can always pick yourself up with the support of your family and community when given a second chance.

When Robert was released from prison it was a dream come true. We were not told in advance by his attorney that he was being released so it was a huge surprise. Once Robert confirmed his release all we could do as a family Is cry, pray and thank God for giving us a second chance to be in his presence again. The happiness that I felt was short lived. The next day when we called the prison to find out how he would be getting home, or could we meet him at the prison? We were told they could not give us any information. The happiness I felt turned to grief quickly. It was like someone was playing a joke on me.

I'm raising a smart but curious 12 year old girl, and Robert serves as a male role model to her. We are proud of all the accomplishments that Robert has made. He offers guidance, information and mentorship for our city youths. He has also supervised summer youth workers learning a trade in

building maintenance. If he can stay in the United States, he could continue to make a great impact on another young boy's life.

When Robert came home it was just like the good old days with lots of Love, Laughs and family time. Growing up he never really cooked much, but now he is a master chef (smile). He cooked most of our daily meals to contribute to the daily function of my home. Robert is now in New York because it's closer to his son. My 12-year-old daughter and I visited Robert this summer and we had a great time. We went to see a play in central park and Visited the Empire State Building. My daughter was so happy to spend time with her uncle and my big brother as I affectionately call him. I don't call him Robert I refer to him always as big brother because he has always been a big brother to me (protecting and providing).

If Robert was to be deported back to Jamaica it would be devastating because we have no family in Jamaica, and he supports me mentally as well. How would he live and support himself in Jamaica? I will not be able to support him while he is in Jamaica because financial it's hard for me due to the extreme rise in Living expenses and as a single mother. He knows absolutely nothing about Jamaica. He is working and providing for himself, and he is a repented man. I hope you would give Robert a second chance and allow him to live in the United States of America the land of opportunity. The Greatest country in the world. We love Robert and we need him to be here for our growing family.

I thank you for giving me the opportunity to express myself regarding my brother Robert Panton.

Sincerely,

Kandel Cornwall Tel: 954-646-9789

BB

November 29, 2023

Dear President Biden & the U.S. Department of Justice:

My name is Tyrone Ward and I am writing in support of Robert Panton who I met during my time inside federal prison from 2018 to 2019 on a probation violation from a passport misuse case. I am from Flint, Michigan, but currently live in Belleville, Illinois. I am married and I have four children with my current partner. My life today is very different from what it was before I met Robert. I credit many of my recent decisions and this new beautiful chapter in my life to a handful of people who supported me and served as role models. Robert is one of those people.

I first met Robert in a transfer federal prison facility in Atlanta where I was placed into his cell to be his roommate. One of the things I remember right away thinking when I met Robert was that he was very different than many others inside. He moved in a noticeably thoughtful way with more wisdom and intention. I gravitated to him for this reason.

Like me, Robert is Muslim so that meant we could pray together and talk about religion and God. He almost always led us in the prayers because he was so wise. We also ate together, watched TV together, worked out together and sometimes Robert encouraged me to study with him too. He was always so thoughtful in how he talked about religion and also the law. We talked a lot about God and our faith and what it meant to our lives. Sometimes Robert would talk about his childhood and the things he wanted to do when he got home. About how he wanted to get involved in his community.

Robert was the person I spent the most time with during my time inside. After Atlanta, we were together in a Kentucky facility. I remember one incident when we were there together where I realized how respected Robert was not just by me, but by so many others. In prison, sometimes the guys segregate based on the regions they are from, like New York or California. But Robert was not someone who moved in these circles. He was matter-of-fact and he didn't play around in groupings that often led to conflict. He kept to himself and focused on religion and studying.

But one day the New York guys, I remember, were having a problem between themselves. Even though Robert did not really spend time with this New York group, those guys came to Robert to ask for his help mediating the problem before it got worse. I could see in how they approached him that they had a lot of respect for him. They sought his advice when something needed to be solved.

Since I was inside for only about a year the other thing that was so striking to me was that I was with someone who had done almost thirty years. It felt so concerning to me and didn't make any sense. He didn't even seem like the type of person who I could even imagine in a life or world of drugs that would lead to a life sentence. I never really understood it. I just remember feeling bad for him. He was already older—maybe 20 years more than me—and he had a lot of family and grandkids he loved.

Robert and I did spend some time looking at his case paper work together. He shared with me how a co-defendant in his case who had been much more involved in the drug case had come home much earlier. And he talked about how much he wanted to get home to his family. He talked about the possibility of getting in front of a judge, but I remember feeling sorry for him because I had just never seen those kinds of remedies work. Even for someone like him where it seemed to me like an obvious overkill, I knew it was so rare for anyone to get released. I honestly didn't think it would happen.

That's why when I heard a judge had given him release I knew it was a big deal. I couldn't believe or expect it even though I knew he deserved it more than anyone I had met. I learned he had been released because I started doing google searches once I was on the outside. Robert was someone I cared about and he was someone I wanted to reach out to make sure he was taken care of no matter where he was in his sentence or life. I didn't expect to hear he was already out and I was so relieved for him when I searched for him online.

Again, I would describe Robert as an uncle or father-figure in terms of the role he played for me during my time inside. He was a natural mentor to many, including me. Just seeing his zeal—being an older man and not giving up at an older age—it inspired me to take life more seriously when I came home.

When I met Robert I did not have a job or any degrees. Today I have a master's degree—a MBA with a focus on finance. I also joined volunteer groups. One of the groups I joined was from International Open University called the Prison Initiative. This is an outreach program for Muslim prisoners. We help them get education—religious and non-religious—so that they can get diplomas, certificates and degrees of that nature. Robert had a lot of influence on me in wanting to do more outreach and be more involved.

A lot of people who are in prison are victims of themselves or their circumstances. They aren't on the right path, but all they need is a voice of reason from someone they can trust and who will encourage them. Robert was that guy for me.

He deserves his well-earned peace and time with his grandkids and family. I hope you will consider granting him a pardon so he is not forced to leave the country.

Sincerely,

Tyrone Ward

ibntyrone@gmail.com

618-691-1706

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Dear President Biden.

My name is Saul Breton and I am 36 years young. I hope this letter finds you in good health and high spirits. I am writing to you today to request your consideration for the pardon of my friend and mentor Robert Panton. I understand the gravity of this request, and I assure you that it is not made lightly. I firmly believe that Robert has demonstrated remorse and rehabilitation and that his continued presence in my life is crucial for my personal and professional development.

Robert has been a guiding light in my life, providing me with invaluable advice, guidance, and support. His wisdom and experience have been instrumental in shaping my character and my career. He has taught me the importance of hard work, integrity, and resilience, and his mentorship has been a significant factor in my achievements to date.

I had a lot of trouble with drugs and alcohol in my twenties and got all my stuff together by the age of 30. I joined school for building repair technician and graduated. I met Robert when the Institute for Career Development sent me to do an internship at Urban Home Ownership and he was my supervisor. Helping me understanding the job hands on and teaching me skills that I carry with me everyday

Robert is a special kind of person. Robert has always been more than just a mentor to me. He has been a guiding light, a source of wisdom, and a pillar of support. One of the most valuable lessons he taught me was the importance of resilience. I remember a time when I was ready to give up on a project that seemed insurmountable. Robert sat me down and shared his own experiences with failure and how those moments, though painful at the time, were crucial for his personal and professional growth. He encouraged me to see the challenge as an opportunity to learn, grow, and become stronger.

The continued guidance and support of Robert is crucial for my success. His mentorship provides me with a unique perspective and insights that I cannot find elsewhere. His advice helps me navigate the challenges I face, and his encouragement motivates me to strive for excellence. Without his guidance, I fear that my personal and professional growth may be hindered.

I think Robert is the kind of people we need in our everyday lives. Specifically in Harlem there's alot of young and middle age people who need the help and support that only blessed humans like Robert are able to bring their dreams into a reality.

I understand that a pardon is a serious matter and is not granted lightly. However, I firmly believe that Robert is deserving of this consideration. He continues to make a positive impact on those around him.

I kindly request that you consider my plea and the positive influence Robert has had on my life and the lives of others. I am confident that granting him a pardon would not only be a testament to the power of rehabilitation and second chances but would also greatly contribute to my continued success.

Thank you for your time and consideration. I am available to provide any further information you may require.

Sincerely.

Saul Breton

saulbreton2@gmail.com

Saul Breton

Date: November 13, 2023



The School of Paralegal Studies

PROFESSIONAL CAREER DEVELOPMENT INSTITUTE

In recognition of completion of the Prescribed Course

The Professional Paralegal Program

this Diploma is hereby awarded to

Robert Panton

In testimony whereof, this Diploma has been conferred in Atlanta, Georgia, whereupon the undersigned have affixed their names on this day

July 27, 1999

President,
Professional Career

Development Institute



Ree Mc Cutchan

President, The School of Paralegal Studies

The School of Paralegal Studies

PROFESSIONAL CAREER DEVELOPMENT INSTITUTE

In recognition of completion of the Prescribed Course

The Professional Paralegal Specialty Program: Civil Litigation

this Diploma is hereby awarded to

Robert Panton

In testimony whereof, this Diploma has been conferred in Atlanta, Georgia, whereupon the undersigned have affixed their names on this day

April 7, 2000

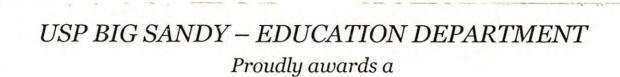
Richard A. Kmay

Professional Career Development Institute



Ree Mc Cutchan

President, The School of Paralegal Studies



Certificate of Achievement

to

Robert Panton

for successfully completing

Emotional Intelligence

May 26, 2019

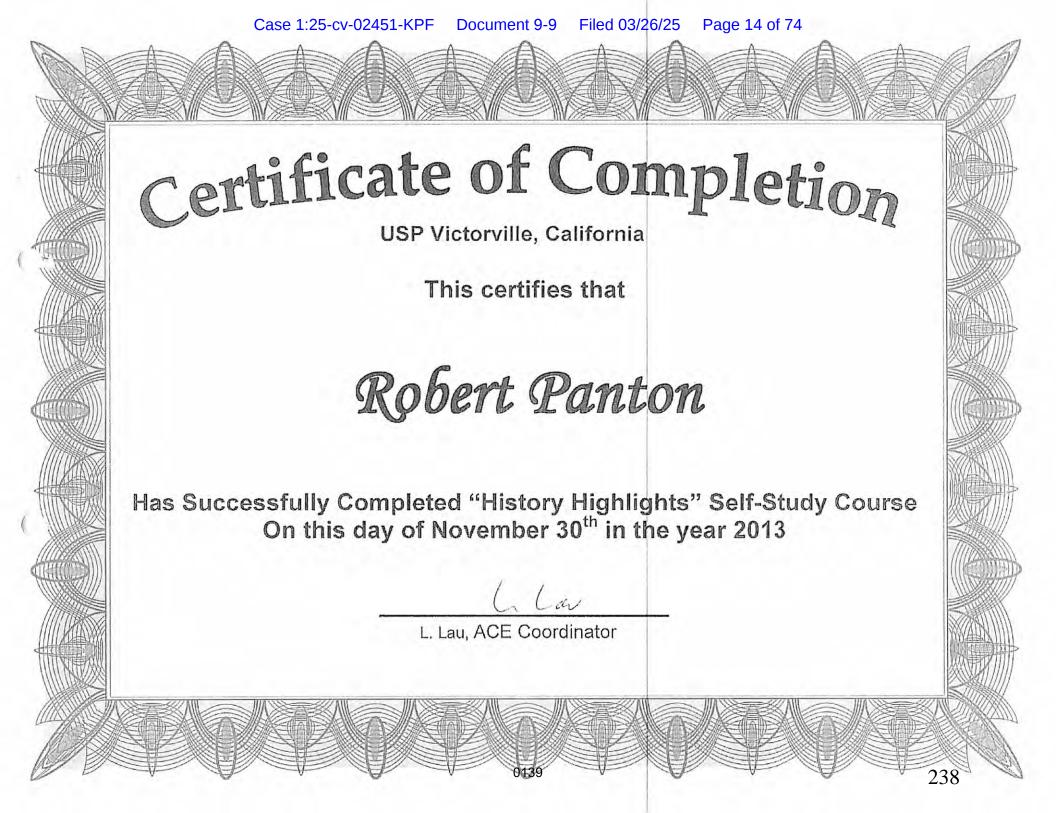
L. Bank

L. Banfi, Education Specialist

CERTIFICATE of Completion

is awarded to
R. Panton
For successfully completing
Beginning Stretching Class
21 February, 2014
USP Victorville, Recreation Department

Williams D.J. Sports Specialist



Certificate of Achievement

USP Victorville, California

This certifies that

Robert Panton

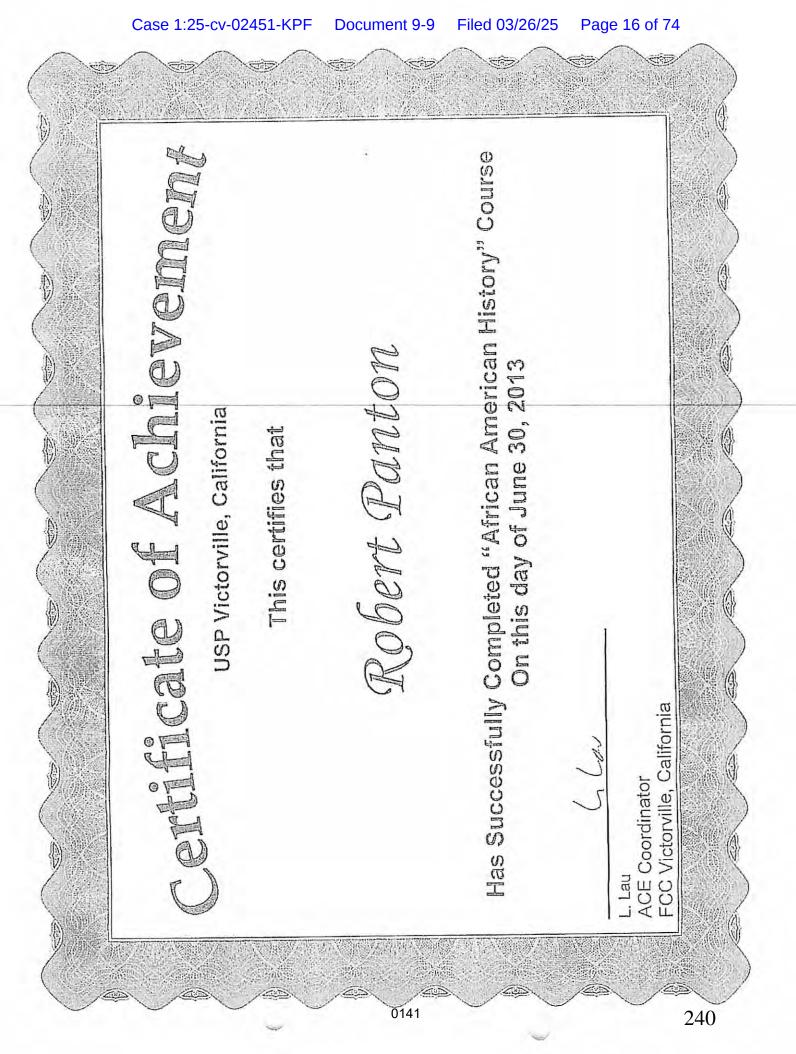
Has Successfully Completed "Screen Writing" Course On this day of June 30, 2013

L. La

L. Lau

ACE Coordinator

FCC Victorville, California



Ceifificate of Achievement

USP Victorville, California



This certifies that

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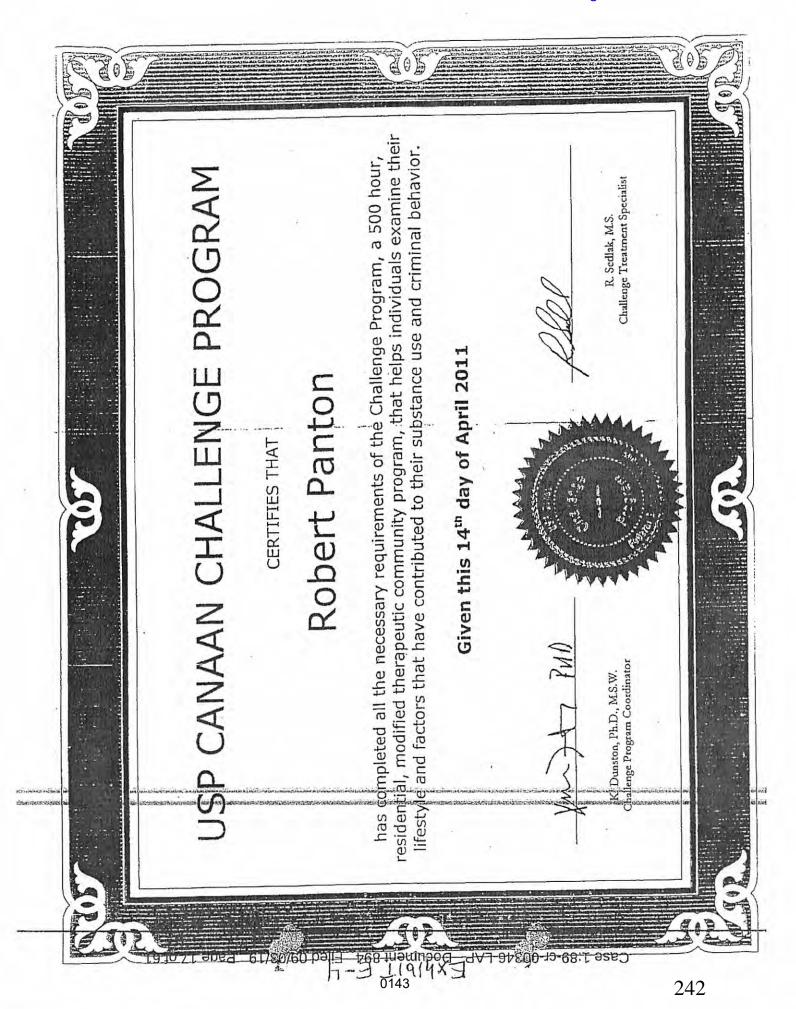
Has Successfully Completed "Critical Thinking" Course

Case 1:25:cv-02451-KPF Document 9-9 Filed 03/26/25 Page 17:01-74

March 22, 2013

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L. Lau, ACE Coordinator







Certificate of Achievement

awarded to:

R. PANTON

#30012-054

FOR SUCCESSFULLY COMPLETING STEP AEROBICS CLASS

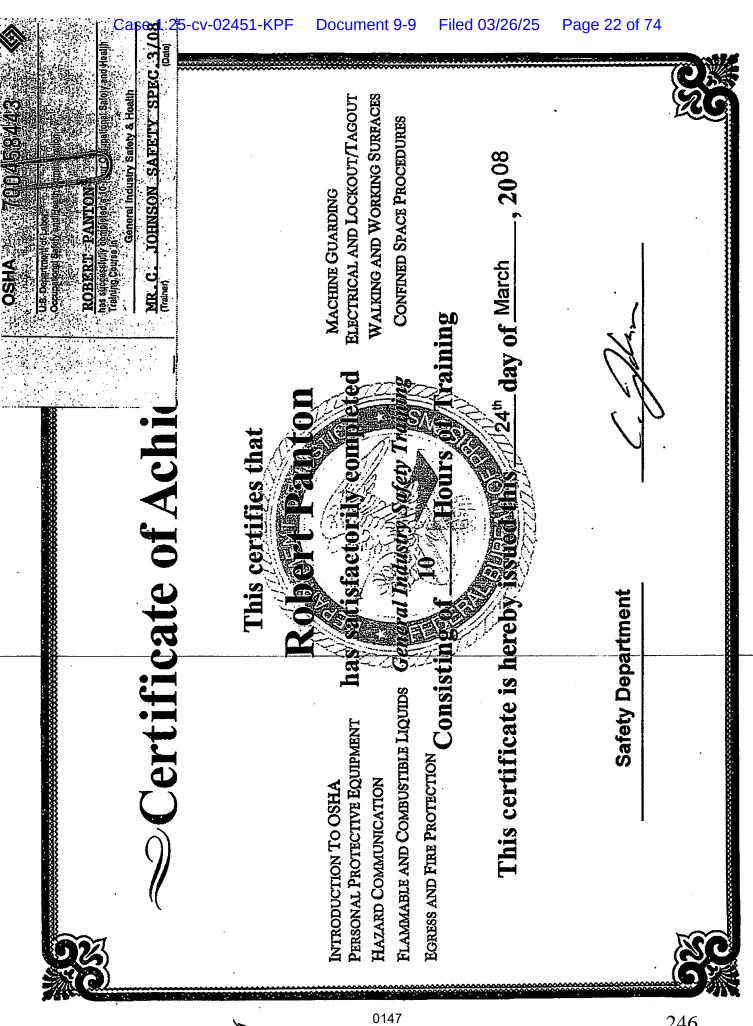
DECEMBER 12, 2009

Signe

RECREATION DEPARTMENT







CERTIFICATE OF RECOGNITION

This is to certify that

Robert Panton

is hereby awarded this certificate for his Outstanding Accomplishment of Completing the A.C.E. Course "Beginnings In Leather" for the Near 2001

J. Smolock, Recreation Spec.

The School of Paralegal Studies

PROFESSIONAL CAREER DEVELOPMENT INSTITUTE

In recognition of completion of the Prescribed Course

The Professional Paralegal Specialty Program: Civil Litigation

this Diploma is hereby awarded to

Robert Panton

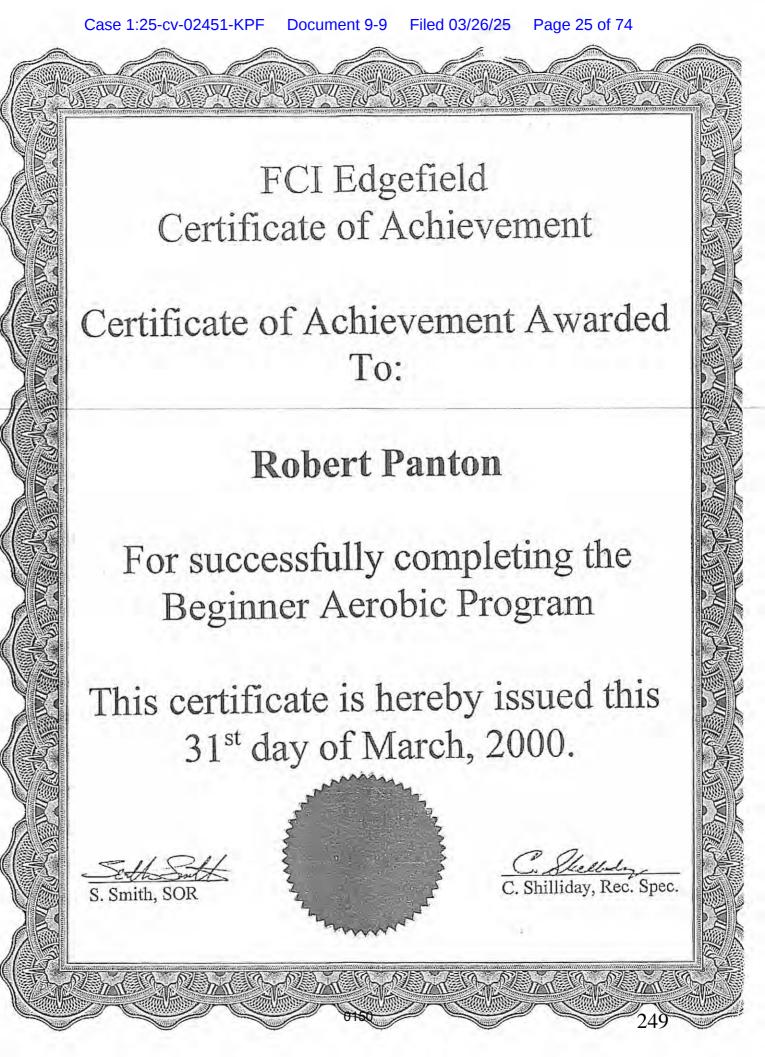
In testimony whereof, this Diploma has been conferred in Atlanta, Georgia, whereupon the undersigned have affixed their names on this day

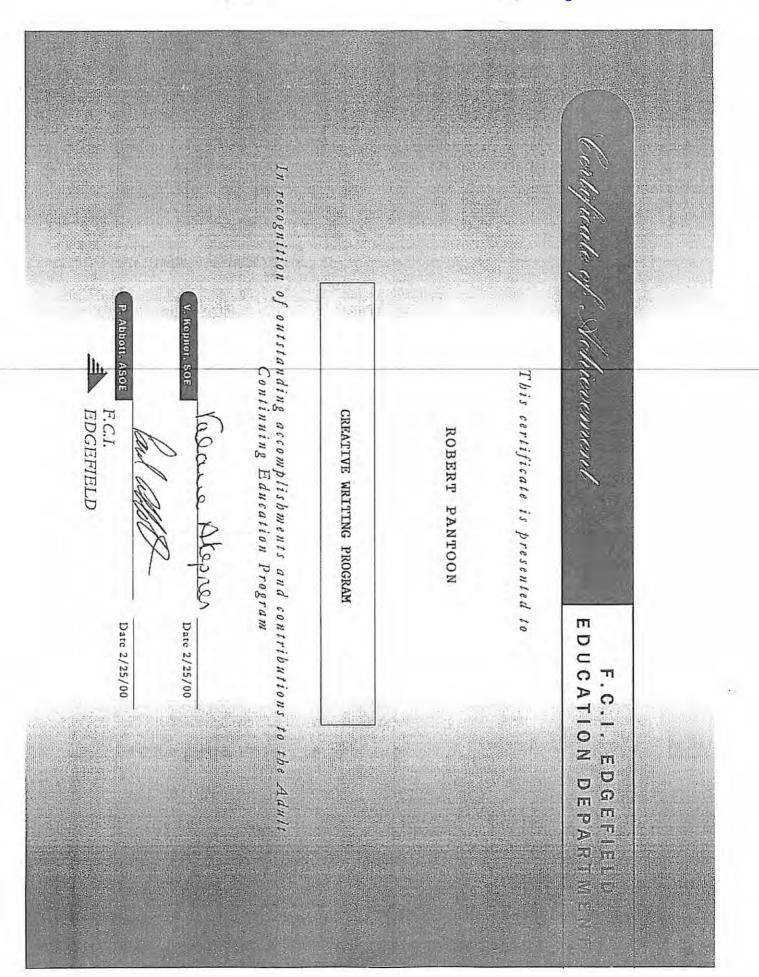
April 7, 2000

President, Professional Career Development Institute

Ree Mc Cutchan

President, The School of Paralegal Studies





The School of Paralegal Studies

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July 27, 1999

President, Professional Career Development Institute Ree Mc Cutchan

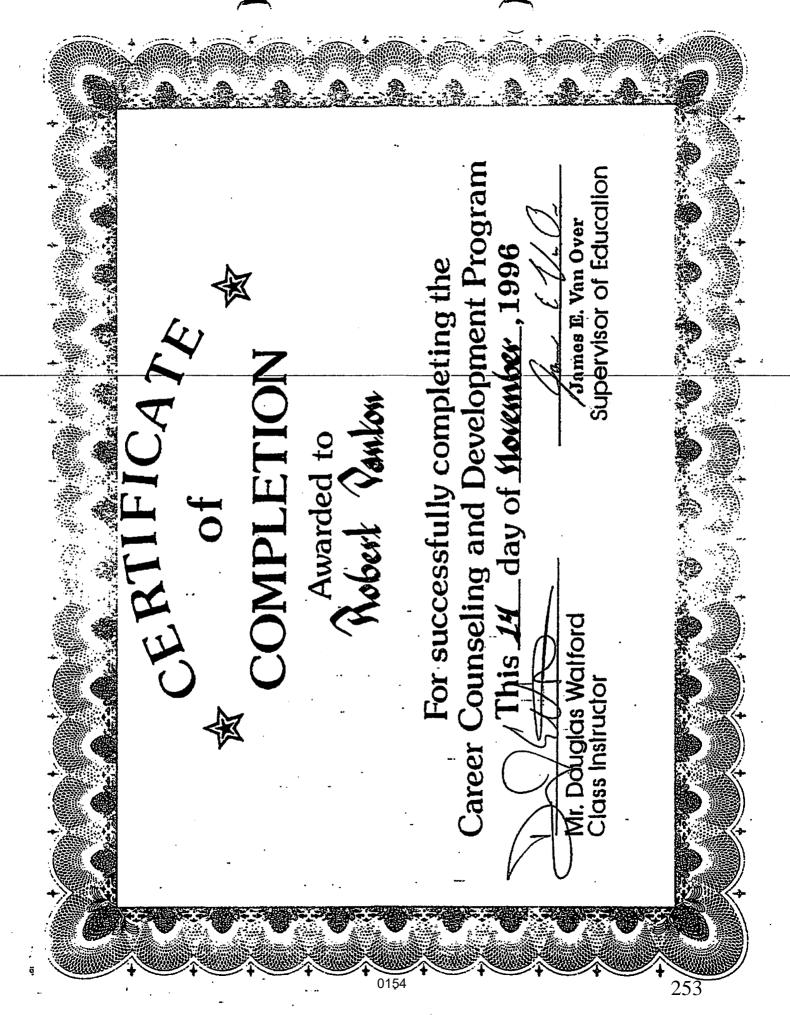
President, The School of Paralegal Studies



Transitional Services Group Robert Panton

has satisfactorily acheived the required Final Phase Training by the Comprehensive Drug Unit at USP-Atlanta. Twelve Months, 12 Hours of Non-Residential Transitional Service After Care Group Participation.

Awarded this 4th day of April, 1997





Completion

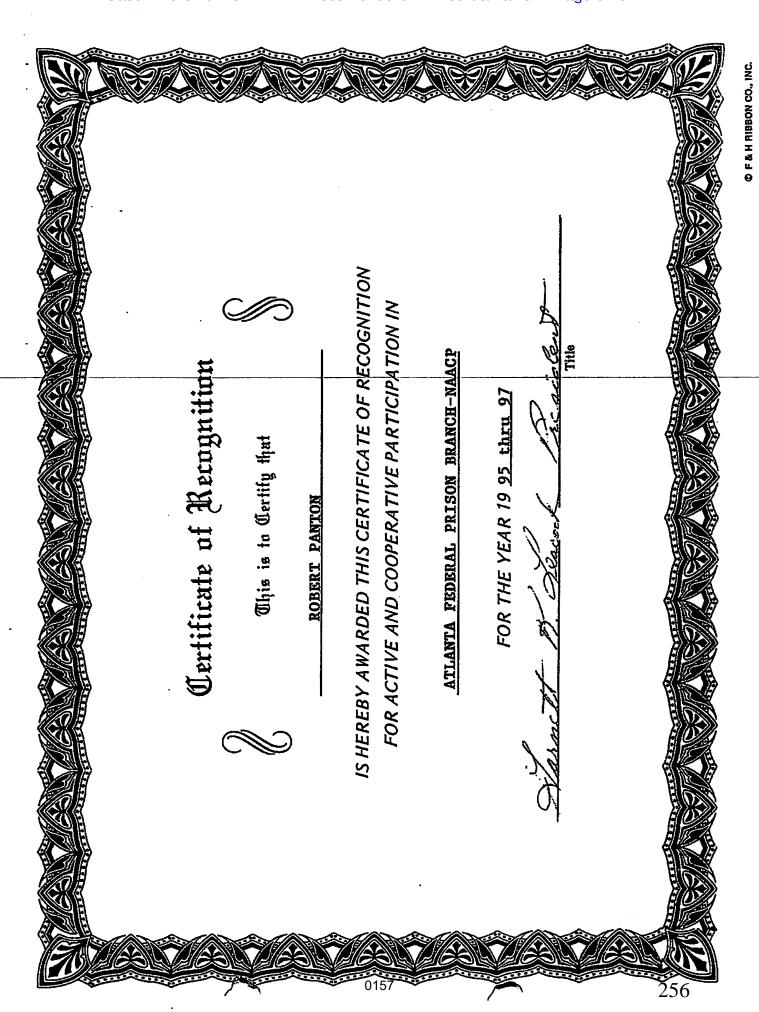
Parenting
Robert Panton

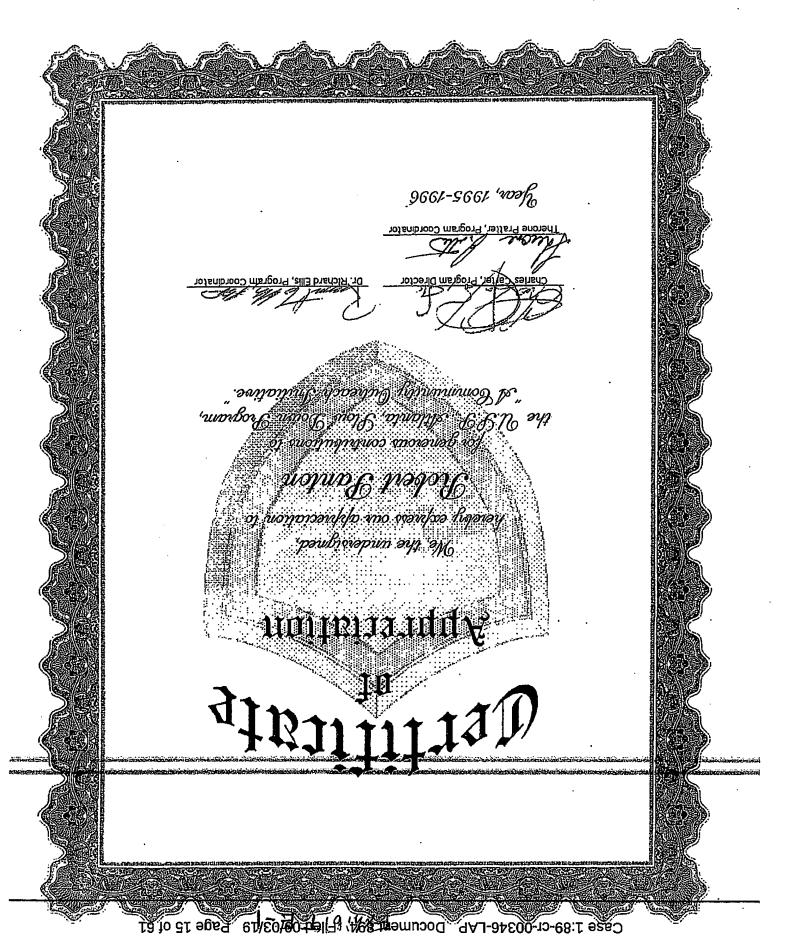
has satisfactorily completed 15 hours of Parenting Skills training by the Residential Comprehensive Drug Staff at USP-Atlanta.

Awarded this 1st day of June, 1996

L. Richardson, Psy. D., DAP Coord.

M. Williams, MA., D.T.S. Instructor







Certificate of Achievement

This certifies that

ROBERT PANTON

has satisfactorily completed

CREATIVE WRITING

Consisting of 32 Hours of Training

This certificate is hereby issued this 30th day of June, 19

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Charlene Scott, EPS

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Certificate of Ammeriation

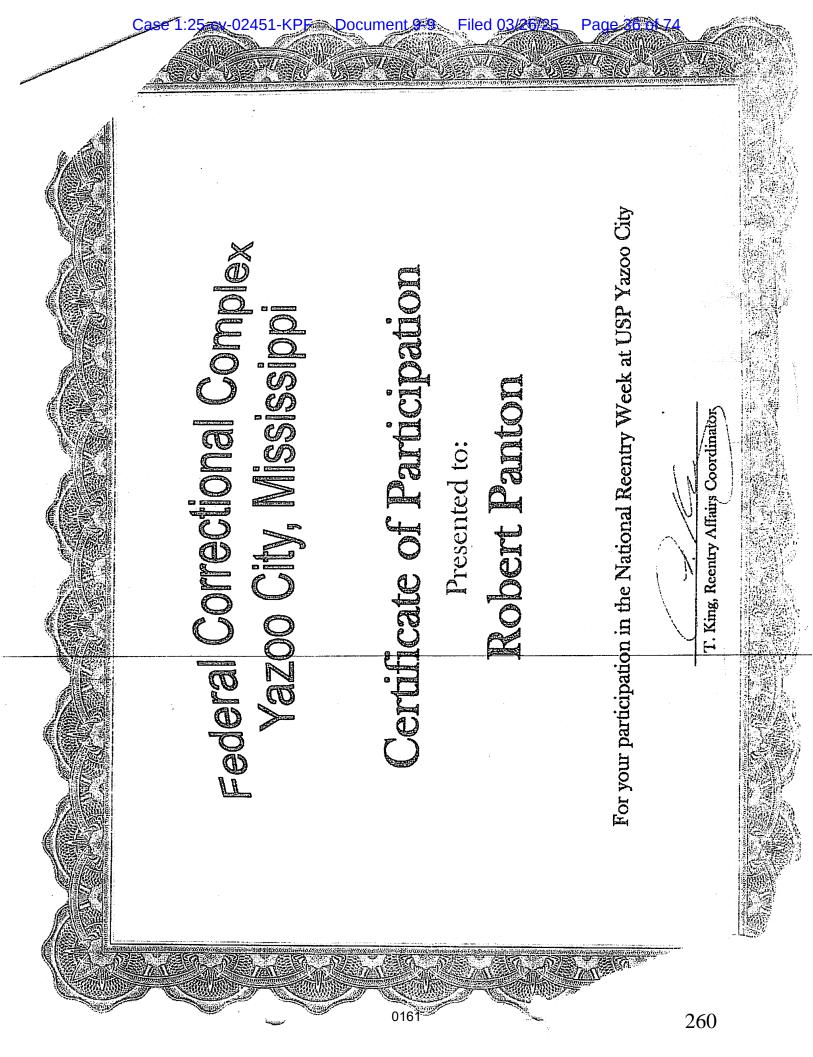
Presented to

Robert Panton

In recognition of initiative, resourcefulness, and action as the Creative Writer Instructor. We, the undersigned, acknowledge our appreciation.

Valarie Kepner, Supervisor of Education

James Robinson, ACE Courdinator



EE



The Organization of Black Screenwriters, Inc.

-Forthe Development and Advancement of African American Writers

March 27, 1997

Robert Panton 8401 Sample Rd. #11 Coral Spring, FL. - 33065

Dear Robert,

Thank you for your submission to our writing competition. Your feature "CAN YOU CROSS OVER?" although not a winner, was selected as one of our five feature Finalist. Congratulations on your efforts.

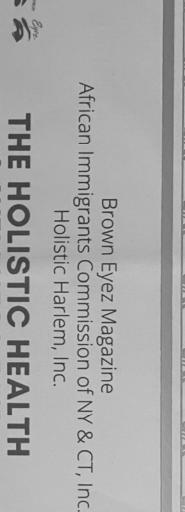
We will be formally announcing the winners at our April 12th meeting. You may call our voice mail after April 1st for the winners names.

As a writer you know the secret to writing is rewriting. We highly encourage you to continue in the education of honing your skills as a writer. I have enclosed a compilation of the industry reviewers' comments on your script to assist you in your rewrite.

Thank you again for your submission and we wish you continued success in your endeavors.

Sincerely regards,

Dorkene L. Hamilton President



MELLNESS FAIR

Presents this

WARRIOR AWARD COMMUNITY

Pojanee Fleury, Publisher of Brown Eyez Magazine

Imani Scott, Chair of Holistic Harlem, Inc.

Mory Kouyate, Chair of African Imm. Comm. NY/CT Mory Kouyate







Picture 1: Robert in a Too Young To Die T-Shirt caring for his granddaughter, Mecca Panton.



Picture 2: Robert with his sister Kandel Cornwall



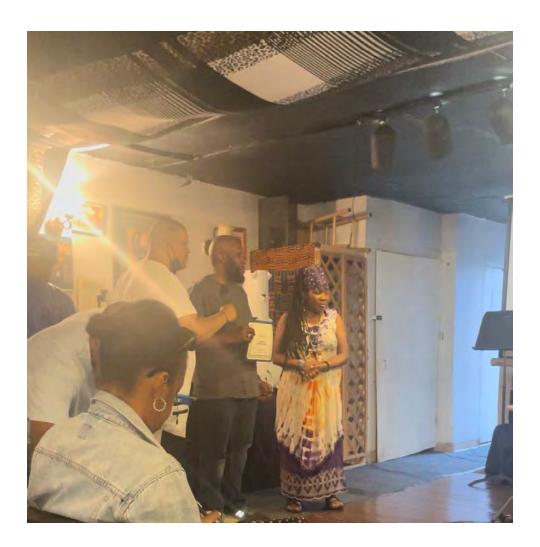
Picture 3: Robert mentoring youth in a summer program with the Urban Home Ownership Corporation during the summer of 2023.



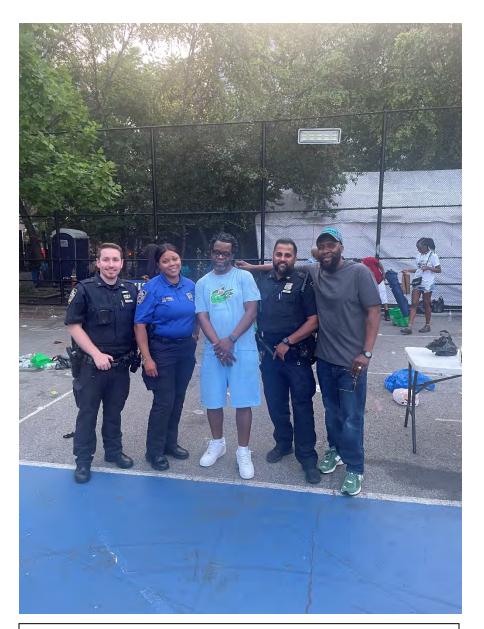
Picture 4: Robert with United States Representative Greg Casar, of Texas District 35, in Washington D.C. advocating for the New Way Forward Act in March 2023.



Picture 5: Robert with Congressman Jesus "Chuy" Garcia and other advocates in Washington D.C. in March 2023 for the introduction of the New Way Forward Act.



Picture 6: Robert receiving the Community Warrior Award from local community organizations in 2023.



Picture 7: Robert with NYPD Police Officers at a community fair in 2023.



Picture 8: Robert with Honor Students and Teachers from Renaissance Charter School



Picture 9: Robert at Melody's Garden in Harlem NY. Melody's Garden is a partner of the Too Young to Die campaign. Through gardening, Melody addresses issues related to food security, greening and urban agriculture.



Picture 10: From left, Rapper Dave East, Robert, Mahdi Salaam and Dapper Dan after an outdoor performance at Dunlevy Milbank Community Center in Harlem New York. The Milbank Community Center helps children in poverty succeed and thrive by providing comprehensive services such as after-school programs, health care services, counseling, and family stabilization programs.

Picture 11: Robert with Summer Youth Mentees in Summer 2023!!





Office of Enforcement and Removal Operations New York Field Office

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U.S. Department of Homeland Security 26 Federal Plaza, Suite 1105 New York, N.Y. 10278



January 10, 2024

National Immigrant Justice Center Attention: Olivia Abrecht Detention Project Staff Attorney 224 S. Michigan Avenue, Suite 600 Chicago, IL 60604

Re: PANTON, Robert (A031 257 320) Request for Deferred Action

Dear Ms. Abrecht,

I have reviewed the request for deferred action submitted by your colleague, Nayna Gupta. After a review of your client's administrative file, I have decided to grant your request for deferred action.

The deferred action will be granted until September 26, 2024. Mr. Panton will be required to report in person to the New York Field Office, 26 Federal Plaza, 9th Floor, Room 9-110, New York, NY 10278 on September 26, 2024.

Please be advised that deferred action is not an immigration benefit or indefinite form of relief from removal. Any change in the facts or circumstances of your client's case may result in this office reconsidering its decision. As always, your client must keep this office informed of any change in address and continue to comply with the requirements of the Intensive Supervision Appearance Program. This decision may not be appealed.

If you have any questions, please contact Deportation Officer J. Rodriguez at 646-296-3820 or email <u>Jaime.N.Rodriguez@ice.dhs.gov</u>.

Sincerely,

Kenneth Genalo Field Office Director New York Field Office E

From: US Pardon Attorney(imailagent) <uspardon.attorney@usdoj.gov>

Sent: Thursday, January 25, 2024 10:33 AM

To: O'Sullivan, Kathleen M. (SEA) < KOSullivan@perkinscoie.com>

Subject: Pardon petition of your client, Robert Savio Panton, Case No. P307411 (Intranet Quorum IMA00906081)

January 25, 2024

Kathleen O'Sullivan, Esquire Perkins Coie LLP 1201 Third Avenue Suite 4900 Seattle, WA 98101-3095

Re: Case No. P307411

Dear Kathleen O'Sullivan Esq:

The presidential pardon application of your client, Robert Savio Panton, has been received in our office, and a waiver of the 5-year waiting period has been granted. Please be aware, however, that the pardon process is extremely lengthy, taking a year or more, both because of the number of matters pending before this office and the need to carefully examine and investigate applications and supporting documentation.

We can give no assurance that final action will be taken by the President within a particular time frame, and, due to resource limitations, we are unable to respond to requests for status updates concerning an application or to provide any information regarding an application's progress in the pardon process. Thus, this correspondence will serve as our only response concerning your client's pardon application,

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pending a final decision. Rest assured, however, that our office will be in contact with you if we have any questions regarding your client's application. As a matter of long-standing policy, the Office of the Pardon Attorney ("PARDON") does not disclose to applicants or third parties the stage at which a clemency application is pending at any given time.

As of April 30, 2018, all status inquiries and confirmation of pending cases should be confirmed by using the Clemency Lookup feature, which is publicly accessible from our website at https://www.justice.gov/pardon/search-clemency-case-status-since-1989. You can now obtain the same information that we provide at any time without the need to wait for a response from our office. It may take up to 90 days for a new case to show up in the Clemency Lookup feature from the time we receive a new petition, so requests for confirmation of receipt will not get a response if the request is premature.

If you have not already provided us with an e-mail address that you monitor regularly, it would greatly facilitate the processing of your client's petition if you would provide it to us at USPardon.Attorney@usdoj.gov so that we may use it as our primary means of contacting you. Please reference the above clemency case number on any future correspondence with our office and be sure to keep us updated should you or your client's contact information change. Without up-to-date contact information such as email, phone number and mailing address, we will be unable to obtain needed information or records, as well as notify you and your client should a decision be reached in his/her case. Although we are unable to predict when a decision will be reached by the President, you will be notified promptly when final action has been taken.

This letter is also intended to ensure that your client is aware of the nature of the information that is publicly available about the identities of executive elemency applicants. As the Privacy Act notice attached to the clemency application states, a public notice is prepared when the President grants clemency, stating the recipient's name, city, state of residence, offense, sentence, as well as the date and district of conviction for the offense for which clemency was granted. PARDON may also provide a copy or make publicly available the warrant granting executive clemency. Moreover, as a matter of wellestablished policy, this office would, if asked by a third party, confirm that a specific, named person has applied for or was granted or denied clemency. Finally, in a court case in which PARDON defended its long-standing practice of declining to release lists of names of persons whose clemency applications have been denied, the federal court of the District of Columbia rejected PARDON's arguments and ruled that lists of the names of persons who have been denied executive clemency by the President are not protected from public disclosure under the Freedom of Information Act (FOIA). See Lardner v. Department of Justice, 638 F. Supp. 2d 14 (D.D.C. 2009), affirmed, Lardner v. United States Department of Justice, No. 09-5337, 2010 WL 4366062 (D.C. Cir. Oct. 28, 2010) (unpublished). Accordingly, clemency applicants should be aware that as a result of the *Lardner* decision, PARDON is now obliged to release existing lists of the names of persons who have been denied executive clemency by the President to anyone who requests such records pursuant to the FOIA. However, pursuant to 28 CFR § 1.5:

Petitions, reports, memoranda, and communications submitted or furnished in connection with the consideration of a petition for executive clemency generally shall be available only to the officials concerned with the consideration of the petition. However, they may be made available for inspection, in whole or in part, when in the judgment of the Attorney General their disclosure is required by law or the ends of justice.

Office of the Pardon Attorney



NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.



THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.



Receipt Number EAC2409050223		Case Type 1918 - PETITION FOR U NONIMMIGRANT STATUS	
Received Date 12/22/2023	Priority Date	Applicant A031 257 320 PANTON, ROBERT SAVIO	
Notice Date 01/17/2024	Page 1 of 2	Beneficiary A031 257 320 PANTON, ROBERT SAVIO	

NATIONAL IMM JUSTICE CENTER c/o OLIVIA ABRECHT 224 S MICHIGAN AVE STE 600 CHICAGO IL 60604 Notice Type: Receipt Notice Fee Waived

We have received the application or petition ("your case") listed above. This notice only shows that your case was filed on the "Received Date" listed above. It does NOT grant you any immigration status or immigration benefit, and it is not evidence that your case is still pending. We will notify you in writing when we make a decision on your case or if we need additional information.

Please save this and any other notices about your case for your records. You should also keep copies of anything you send us, as well as proof of delivery. Have these records available when you contact us about your case.

Contacting the Agency

If your safe mailing address changes and you do not have an attorney of record or representative on your case you must submit your address change in writing, with your signature, to the center with jurisdiction over your filing. Otherwise, you might not receive notice of your action on this case. If any other changes need to be made you also must contact the center with jurisdiction over your filing in writing. Please include what changes need to be made and your signature.

If any of the information in your notice is incorrect or you have questions about your case, you can reach USCIS at www.uscis.gov/contact, utilizing the available case inquiry options for "Inquiries for VAWA, T, and U Filings."

Vermont Service Center

U.S. Citizenship & Immigration Services

38 River Road

Essex Junction, VT 05479-0001

Processing time - Processing times vary by case type. Go to www.uscis.gov to see the current processing times listed by case type and office.

- View your case status on our website's Case Status Online page.
- You can also sign up to receive free email updates as we process your case.
- During most of the time while your case is pending, the processing status will not change. This is because we are working on cases that were filed before your case.
- When we make a decision on your case or if we need something from you, we will notify you by mail and update our systems.
- If you do not receive an initial decision or update from us within our current processing time, visit our website at www.uscis.gov for options for submitting an inquiry.

Biometrics - We require biometrics (fingerprints, a photo, and a signature) for some types of cases. If we need biometrics from you, we will send you a SEPARATE appointment notice with a specific date, time and place for you to go to a USCIS Application Support Center (ASC) for biometrics processing. You must wait for that separate appointment notice and take it (NOT this receipt notice) to your ASC appointment along with your photo identification. Acceptable kinds of photo identification are:

- · A passport or national photo ID issued by your country,
- · A driver's license,
- · A military photo ID, or
- A state-issued photo ID card.

If you receive more than one ASC appointment notice (even for different cases), take them both to the first appointment date.

Return of Original Documents - Use Form G-884, Request for the Return of Original Documents, to request the return of original documents submitted to establish eligibility for an immigration or citizenship benefit. You only need to submit one Form G-884 if you are requesting multiple documents contained in a single USCIS file. However, if the requested documentation is in more than one USCIS file, you must submit a separate request for each file. (For example: If you wish to obtain your mother's birth certificate and your parents' marriage certificate, both of which are in the USCIS file that pertains to her, submit one Form G-884 with your mother's information.)

Please see the additional information on the back. You will be notified separately about any other cases you filed.

USCIS encourages you to sign up for a USCIS online account. To learn more about creating an account and the benefits, go to https://www.uscis.gov/file-online.

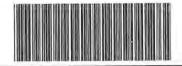
Vermont Service Center

U.S. CITIZENSHIP & IMMIGRATION SVC

38 River Road

Essex Junction VT 05479-0001

USCIS Contact Center: www.uscis.gov/contactcenter



THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.



Receipt Number		Case Type	
EAC2409050223		1918 - PETITION FOR U NONIMMIGRANT STATUS	
Received Date 12/22/2023	Priority Date	Applicant A031 257 320 PANTON, ROBERT SAVIO	
Notice Date	Page	Beneficiary A031 257 320	
01/17/2024	2 of 2	PANTON, ROBERT SAVIO	

NOTICE: The information you provide on and in support of applications and petitions is submitted under the penalty of perjury. USCIS and the U.S. Department of Homeland Security reserve the right to verify this information before and/or after making a decision on your case so we can ensure that you have complied with applicable laws, rules, regulations, and other legal authorities. We may review public information and records, contact others by mail, the internet or phone, conduct site inspections of businesses and residences, or use other methods of verification. We will use the information obtained to determine whether you are eligible for the benefit you seek. If we find any derogatory information, we will follow the law in determining whether to provide you (and the legal representative listed on your Form G-28, if you submitted one) an opportunity to address that information before we make a formal decision on your case or start proceedings.

Please see the additional information on the back. You will be notified separately about any other cases you filed

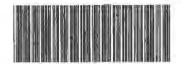
USCIS encourages you to sign up for a USCIS online account. To learn more about creating an account and the benefits, go to https://www.uscis.gov/file-online.

Vermont Service Center
U.S. CITIZENSHIP & IMMIGRATION SVC

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Essex Junction VT 05479-0001

USCIS Contact Center: www.uscis.gov/contactcenter



G

February 05, 2024

VIA ICE eService Portal

Office of the Principal Legal Advisor Chicago, IL

Re: PROSECUTIORIAL DISCRETION REQUEST FOR ROBERT PANTON (A031-257-320)

Dear Assistant Chief Counsel,

The National Immigrant Justice Center represents Mr. Robert Savio Panton (A#031-257-320), a 58-year-old community leader in Harlem, who was recently granted deferred action by the New York ICE Field Office due to a pending application for U-non-immigrant status. *See* Ex. A (Grant of Deferred Action), Ex. B (USCIS Receipt Notice). Mr. Panton has a final order removal from the Chicago Immigration Court. Mr. Panton respectfully requests that OPLA join a motion to reopen and remand his immigration case from the Board of Immigration Appeals so that a waiver of inadmissibility may be adjudicated by an Immigration Judge under *L-D-G-v. Holder*, 744 F.3d 1022 (7th Cir. 2014). Mr. Panton respectfully requests your consideration and response by February 20, 2024.

Attached to this request is the following supporting documentation:

- Form E-27, Notice of Entry of Appearance as Attorney;
- Tab A, Proposed Joint Motion to Reopen
- Tab B, ICE ERO Grant of Deferred Action, dated January 10, 2024
- Tab C, U visa Receipt Notice (No. EAC2409050229), dated January 17, 2024, received Jan 23, 2024.
- Tab D, U Visa Application, Filed December 21, 2024

I. Factual Background

Mr. Panton is a community leader, youth mentor, father and grandfather in Harlem, who came to the United States at four years old as a lawful permanent resident from Jamaica. He has three children who are U.S. citizens, Aaron, Shamecca, and Dajon—a New York Police Department officer who credits his father with guiding him to a life of service. Mr. Panton is also a doting grandfather to ten grandchildren and has three U.S. citizen sisters. Mr. Panton currently lives in Harlem, where he is involved in community-led efforts to build a safer, supportive neighborhood for youth. His numerous accomplishments and contributions are evidenced in the attached letters of support, which include letters from U.S. Rep. Jerrold Nadler(NY-12) and U.S. Rep. Adriano Espaillat (NY-13). See Tab D, U Visa Application at Ex. N, O.

Robert Savio Panton A# 031-257-320

Mr. Panton was ordered removed in January 2021 by Immigration Judge Samuel B. Cole due to a single non-violent, drug conviction from over 30 years ago. Mr. Panton was convicted in 1992 to one count of conspiring to distribute and possess with intent to distribute more than a kilogram of heroin between April 1988 and May 1989 in violation of 21 U.S.C. §§ 821, 841(a)(1), and 841(b)(1)(A). In 1994, Mr. Panton was sentenced to life imprisonment, an unduly harsh sentence that would be significantly lower today due to recent criminal justice reforms.¹

In the wake of such reforms, in 2020, Judge Preska of the Southern District of New York, reduced Mr. Panton's sentence to time served. Mr. Panton was released from custody in August 2020. Judge Preska found that during his time in prison, Mr. Panton had "fully rehabilitated himself". *See* Tab D at Ex. E. Mr. Panton deeply regrets his involvement in the drug trade in Harlem and has committed himself to making amends by helping young people in Harlem avoid the mistakes he made. His demonstrated remorse and commitment to making reparations for past harm is such that the original prosecutor in his case has written a letter of support for Mr. Panton, writing

"In light of Mr. Panton's acceptance of responsibility and expression of remorse and his continued positive trajectory since his release, I support Mr. Panton's application or a pardon. In particular I see no reason to deport Mr. Panton to Jamaica at this point."

Tab D at Ex M (Letter of Support, Henry DePippo, former AUSA). *See also* Exs N-FF (Additional Letters of Support from Community Leaders, Family, and Mentees).

Despite a final order of removal, Mr. Panton was released from ICE custody in April 2021 and granted two consecutive stays of removal by ICE ERO. *See* Tab D, U Visa App at Ex. H (Stays of Removal). He now benefits from a grant of deferred action based on a pending application for U non-immigrant status. Tab B (Grant of Deferred Action).

Mr. Panton's Pending Application for U Non-Immigrant Status

Mr. Panton was the victim of the qualifying U visa Crimes of Attempt to Commit Murder and Felonious Assault in 1991. *See* Tab D, U Visa App. Mr. Panton was shot twice and was taken to the Metropolitan Hospital in serious condition. *Id.* Thereafter, he cooperated with the NYPD in their investigation. *Id.* Mr. Panton first requested certification from the NYPD in December 2020, after his detention by ICE. *Id.* The NYPD certified and provided the requisite Form I-918 Supplement B on December 11, 2023. *Id.* Mr. Panton promptly filed his application for U non-immigrant status on December 21, 2023. *See* Tab C (USCIS Receipt Notice). Mr. Panton has requested waiver of any grounds of inadmissibility that may apply and has submitted evidence to USCIS that he merits an exercise of discretion due to his demonstrated remorse, rehabilitation, and exemplary record of community service, as well as his extensive roots and familial relationships in the United States. *See* Tab D. Mr. Panton is still waiting for a receipt notice for Form I-192.

I. Mr. Panton Merits Reopening of His Case to Permit Adjudication of a Waiver for his U visa application.

¹ See U.S. Sentencing Commission Guidelines Manual (2023) at 2, https://www.ussc.gov/sites/default/files/pdf/guidelines-manual/2023/GLMFull.pdf.

Prosecutorial discretion is appropriate to ensure "fair outcomes in individual cases" and is evaluated on a case-by-case basis. *See* Office of the Principal Legal Advisor, Prosecutorial Discretion and the ICE Office of the Principal Legal Advisor (last updated September 12, 2022), https://www.ice.gov/about-ice/opla/prosecutorial-discretion.

Mr. Panton's removal proceedings are venued in the Seventh Circuit, where Immigration Judges are vested with the jurisdiction to grant waivers of inadmissibility for applications for U non-immigrant status under *L-D-G-v. Holder*, 744 F.3d 1022 (7th Cir. 2014). Given Mr. Panton's new eligibility for relief, he merits reopening of his case to allow adjudication of a waiver for his meritorious application. **Attached herein is a draft Joint Motion to Reopen at Tab A.**

Joining a motion to reopen in an exercise of discretion is consistent with ICE Directive 11005.3, issued August 10, 2021, which states that ICE should" alert[] OPLA attorneys to the victim status of a noncitizen in removal proceedings so that appropriate prosecutorial discretion may be considered." Under ICE Directive 11005.3, "exceptional circumstances" counseling against an exercise of discretion are defined narrowly to two circumstances: 1) where the noncitizen poses national security concerns and 2) where the noncitizen poses an articulable risk of death, violence, or physical harm to any person. Mr. Panton fits neither category, as discussed further below.

Additionally, a favorable exercise of prosecutorial discretion is consistent with the September 30, 2021 memorandum issued by Secretary Alejandro Mayorkas, which became effective on November 29, 2021 ("the Mayorkas Memo"). The Mayorkas memo requires that ERO focus its efforts on individuals who are a threat to either (1) national security, (2) public safety, or (3) border security. Pursuant to the guidance established in the memo, Mr. Panton is not a threat to national security public safety, or border security. Mr. Panton is not a threat to national security because he has never engaged in or has been suspected of terrorism, espionage, or any terrorism or espionage-related activities. Mr. Panton is not a threat to public safety because his sole conviction from over 30 years ago was a non-violent drug offense and a federal judge deemed him "fully rehabilitated" when she reduced his sentence to time served in recognition of his accomplishments and commitment to community service. Lastly, Mr. Panton is not a threat to border security because he was not apprehended at a port of entry and he entered the United States far prior to November 1, 2020.

Furthermore, the Mayorkas memo states that exercising prosecutorial discretion is guided "by the fact that the majority of undocumented noncitizens who could be subject to removal have been contributing members of our communities for years." Mr. Panton who has lived in the U.S. for over 50 years, is exactly that—a contributing member of his community. *See generally* Tab D. In addition to his familial contributions as a father and grandfather, Mr. Panton is active in Harlem as a youth mentor. *See* Tab D, Exs. M-FF. He runs a suicide prevention hotline, fielding calls from young people at all hours of the day in need of assistance and someone who will listen. *Id.* He also collaborates with organizations like Lead by Example and Urban Home Ownership Corporation to offer programming and counseling to young people. *Id at* Ex. T (Letter of Support from Antonio Hendrickson, founder of Lead by Example Reverse The trend); Ex. U (Letter of Support by Sheila Davis Dotson).

Therefore, given Mr. Panton's status as a respected Harlem community leader and beloved father and grandfather, Mr. Panton respectfully requests your favorable consideration of his request to join a motion to reopen to the Board of Immigration Appeals to permit adjudication of a waiver for his pending application for U non-immigration statutes.

Sincerely,

/s/Olivia Abrecht

Olivia Abrecht
National Immigrant Justice Center
Staff Attorney, Detention Project
oabrecht@heartlandalliance.org
T: 312-224-1348; F: 312-224-1348





(/sites/eservice3/2411399/)



Submission Undergoing Review - Acceptance Pending Approval



Document in eService Queue - Service of Process Pending Approval

Print

THIS NOTICE DOES NOT CONSTITUTE ACCEPTANCE AS SERVICE OF PROCESS

ANumber: 031257320

Total Files: 1

Date Received: 02-05-2024 11:19:18 am

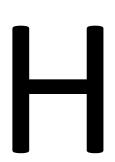
Subject: Panton Request for Prosecutorial Discreation - Joint Motion to Reopen and Remand files:

Panton_Request for JMTR_2.05.2024.pdf

This notice is sent as a courtesy to advise you that your submission is currently pending acceptance as an eService filing. After review, if the submission meets our eService criteria, you will receive a notice acknowledging that your submission was accepted. If the submission does not meet our criteria, you will receive a rejection notice, and the matter will not be accepted for service of process.

THIS NOTICE DOES NOT CONSTITUTE ACCEPTANCE AS SERVICE OF PROCESS.

The eService Team...



Reconsideration of Prosecutorial Discretion Request for Robert Panton (A031-257-320)

Olivia Abrecht <oabrecht@immigrantjustice.org>

Fri 3/1/2024 9:09 AM

To:oplachicagochiefcounsel@ice.dhs.gov < oplachicagochiefcounsel@ice.dhs.gov > Cc:Galassi, Jessica < Jessica.J,Galassi@ice.dhs.gov >

3 attachments (718 KB)

Panton_JMTR request denial_2.26.24.pdf; Panton_Request for JMTR Cover_2.05,2024.pdf; Panton_Request for PD reconsideration_2.29.24.pdf;

Dear Chief Counsel Lundgren,

I represent Robert Savio Panton (A031-257-320), who submitted a request for prosecutorial discretion to your office on February 5, 2024 via the ICE e-service portal (PD cover letter attached). Mr. Panton has a pending U visa application and requested that ICE OPLA join a motion to reopen and remand his immigration case from the Board of Immigration Appeals so that a waiver of inadmissibility may be adjudicated by an Immigration Judge under L-D-G- v. Holder, 744 F.3d 1022 (7th Cir. 2014). His request for prosecutorial discretion has the support of U.S. Rep. Adriano Espaillat (NY-13) and Senator Kristen Gillibrand (NY). On February 26, 2024, Mr. Panton received a denial of his request (see attached). Mr. Panton respectfully requests reconsideration in light of his numerous positive equities.

Mr. Panton is a 58-year-old grandfather, and community leader in Harlem, who came to the United States from Jamaica at 4 years old as a lawful permanent resident. He was ordered removed in 2021 by Immigration Judge Samuel B. Cole due to a 30-year-old non-violent drug conviction. Recognizing his numerous positive equities, ICE ERO granted him two consecutive stays of his deportation. This year, he was granted deferred action by the New York ICE Field Office because he now has a pending application for U non-immigrant status and a pending application for a presidential pardon, which is supported by the prosecuting attorney in his criminal case.

Mr. Panton merits an exercise of prosecutorial discretion to reopen his removal proceedings because he is not a priority for removal. He has demonstrated rehabilitation and commitment to community service, benefits from extensive familial ties to the United States and received an outpouring of community support from elected officials and community leaders including Senators Schumer and Gillibrand, and U.S. Reps Espaillat and Jerrold Nadler (NY-12). See U Visa Application at Tab D of original request for prosecutorial discretion.

Therefore, given Mr. Panton's status as a respected Harlem community leader and beloved father and grandfather, Mr. Panton respectfully requests your favorable re-consideration of his request to join a motion to reopen to the Board of Immigration Appeals to permit adjudication of a waiver for his pending application for U non-immigration status.

Sincerely,

Please note my new email address:

oabrecht@immigrantjustice.org

NIJC's Chicago office also has a new address:

111 W. Jackson Blvd., Suite 800 Chicago, IL 60604 [immigrantjustice.org]immigrantjustice.org

RE: PD Request Denial Raising Systemic Issues - Robert Panton (A031-257-320)

Falcone, Michael < Michael.A.Falcone@ice.DHS.gov>

Tue 4/2/2024 11:15 AM

To:Heidi Altman <haltman@immigrantjustice.org>;Padilla, Kenneth <Kenneth.Padilla@ice.dhs.gov>
Cc:Elizabeth Kalmbach Clark <EKalmbach@immigrantjustice.org>;Olivia Abrecht <oabrecht@immigrantjustice.org>;Nayna Gupta <NGupta@immigrantjustice.org>

Attorney Altman,

Thank you for reaching out.

While I do not see this denial to join a motion to reopen as a systematic issue with the prosecutorial discretion (PD) review process in OPLA Chicago, I did take another look at the case. Since reopening the case will ultimately have no impact on the removability of your client (additional relief is not available) and USCIS still can adjudicate the pending U-visa application, I see no reason to disturb OPLA Chicago's PD decision.

Michael A. Falcone
Deputy Principal Legal Advisor
Field Legal Operations
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
(202) 732-6133 (office)
(646) 221-0910 (cell)
Michael.A.Falcone@ice.dhs.gov

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^{***} WARNING *** ATTORNEY/CLIENT PRIVILEGE *** ATTORNEY WORK PRODUCT ***

U.S. Department of Justice

Executive Office for Immigration Review Board of Immigration Appeals OMB#1125-0005

Notice of Entry of Appearance as Attorney or Representative Before the Board of Immigration Appeals

ALIEN ("A") NUMBER (Provide A- number of the party/parties		(Type or Print) NAME AND ADDRESS OF REPRESENTED PARTY			
	represented) 031257320	Panton		S	Robert
ide beneficiary	USCIS Visa Appeal (Provide b	(Last)	Initial)	(Middle Ini	(First)
	name and A number)	1A			135 W. 123rd St
	Fine (Provide fine number)	(Apt. No.)		er and Street)	(Number
	The (Floride line number)	20017	NY		New York
docket number)	Disciplinary case (Provide dock	(Zip Code)	(State)		(City)
		ing):	k one of the follow	ative (please check o	Attorney or Representati
se side if		he District of Columbia (voneding, enjoining, restrain, do not check this box ar	mmonwealth(s), or t order disbarring, susp oject to such an orde	s), territory(ies), common not subject to any ord jurisdiction (if subject)	states(s), possession(s), necessary), and I am no practice of law in any ju
	licable) 6343286	Bar Number (if app	Court	Illinois Supreme Co	Full Name of Court
K. §	n Review as defined in 8 C.F.R. §	ve Office for Immigration			I am a representative ac 1292.1(a)(4) with the fo
(country).)(3). 8 C.F.R. § 1291.1(a)(5), 23, 1952, under 8 C.F.R. §	official, as defined in	reign government offi	
tions governing name and any	ove and I appear in that capacity. forth the regulations and conditions I consent to publication of my name to the rules and procedures at 8 C.F.R ing is true and correct.	or, and at the request of, the e for the party named about tide of this form that set feals. By signing this form, discipline by EOIR pursuant to	y or representative for alified Representative ided on the reverse of d of Immigration App subject to any public e laws of the United State	pearance as attorney of e provision of a Qualif the statements provide ions before the Board of DIR, should I become sul- y of perjury under the law	EOIR has ordered the p I have read and understand th appearances and representation
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DDRESS	NUMBERS, & EMAIL ADD	RESS, FAX & PHONE	ENTATIVE, ADDI	Y OR REPRESEN	NAME OF ATTORNEY
	Abrecht	J	2	281.53	Name: Olivia
	(Last)	Aiddle Initial)	(1)	(First)	Address: P.O. Box 818
	(Suite)	iber and Street)		nmigrant Justice	
	60690	IL.			Chicago
	(Zip Code)	(State)		(City)	(0
	nigrantjustice.org	Email: oabrecht@imm	3122241348	Facsimile: 31	Telephone: 3122241348
	Check here if new address				
	(Zip Code) nigrantjustice.org	(State) Email: oabrecht@imm		(City)	

Case 1:25-cv-02451-KPF Document 9-9 Filed 03/26/25 Page 72 of 74

Indicate Type of Appearance: Primary Attorney/Representative I am providing pro bono representation.	Non-Primary Attorney/Representative Check one: yes no	
I (Name) Olivia Abrecht	Proof of Service provided a copy of this Form EOIR-27 on (Date) 04/09/2024	to the
DHS (U.S. Immigration and Co	nigration Services – USCIS) at	
	ally filed this document, and the opposing party is participating i	n ECAS.

APPEARANCES - An appearance for each represented party shall be filed on a separate Form EOIR-27 by the attorney or representative appearing in each appeal or motion before the Board of Immigration Appeals (see 8 C.F.R. § 1003.38(g)), even though the attorney or representative may have appeared in the case before the Immigration Judge or the U.S. Citizenship and Immigration Services. For information on how to file a Form EOIR-27 with the Board of Immigration Appeals, please see the EOIR website at www.justice.gov/eoir. If information is omitted from the Form EOIR-27 or it is not properly completed, the appearance may not be recognized, and the accompanying filing may be rejected. When an appearance is made by a person acting in a representative capacity, his/her personal appearance or signature constitutes a representation that, under the provisions in 8 C.F.R. part 1003, he/she is authorized and qualified to represent individuals and will comply with the EOIR Rules of Professional Conduct in 8 C.F.R. § 1003.102. Thereafter, substitution or withdrawal may be permitted upon approval by the Board of a request of the attorney or representative of record in accordance with Matter of Rosales, 19 I&N Dec. 655 (1988). Appearances for limited purposes are not permitted. See Matter of Velasquez, 19 I&N Dec. 377, 384 (BIA 1986). Note: Attorneys and Accredited Representatives (with full accreditation) must register with the EOIR eRegistry in order to practice before the Board of Immigration Appeals (see 8 C.F.R. § 1292.1(f)). Registration must be completed online on the EOIR website at www.justice.gov/eoir. Attorneys and Accredited Representatives (with full accreditation) must first update their address in eRegistry before filing a Form EOIR-27 that reflects a new address.

FREEDOM OF INFORMATION ACT - This form may not be used to request records under the Freedom of Information Act or the Privacy Act. The manner of requesting such records is in 28 C.F.R. §§ 16.1-16.11 and appendices. For further information about requesting records from EOIR under the Freedom of Information Act, see How to File a Freedom of Information Act (FOIA) Request With the Executive Office for Immigration Review, available on EOIR's website at http://www.justice.gov/eoir.

PRIVACY ACT NOTICE - The information requested on this form is authorized by 8 U.S.C. § 1362 and 8 C.F.R. § 1003.3 in order to enter an appearance to represent a party before the Board of Immigration Appeals. The information you provide is mandatory and required to enter an appearance. Failure to provide the requested information will result in an inability to represent a party or receive notices of actions in a proceeding. EOIR may share this information with others in accordance with approved routine uses described in EOIR's system of records notice, EOIR-001, Records and Management Information System, 69 Fed. Reg. 26,179 (May 11, 2004), and EOIR-003, Practitioner Complaint-Disciplinary Files, 64 Fed. Reg. 49237 (September 1999), or their successors. Furthermore, the submission of this form acknowledges that an attorney or representative will be subject to the disciplinary rules and procedures at 8 C.F.R. 1003.101 et seq., including, pursuant to 8 C.F.R. §§ 292.3(h)(3), 1003.108(c), publication of the name of the attorney or representative and findings of misconduct should the attorney or representative be subject to any public discipline by EOIR.

CASES BEFORE EOIR - Automated information about cases before EOIR is available by calling (800) 898-7180 or (240) 314-1500.

ADDITIONAL INFORMATION:

Under the Paperwork Reduction Act, a person is not required to respond to a collection of information unless it displays a valid OMB control number. We try to create forms and instructions that are accurate, can be easily understood, and which impose the least possible burden on you to provide us with information. The estimated average time to complete this form is six (6) minutes. If you have comments regarding the accuracy of this estimate, or suggestions for making this form simpler, you can write to the Executive Office for Immigration Review, Office of the General Counsel, 5107 Leesburg Pike, Suite 2600, Falls Church, Virginia 22041.

U.S. Department of Justice

Change of Address/Contact Information Form Board of Immigration Appeals

Executive Office for Immigration Review

Instructions: This form is to be used by the parties in proceedings before the Board of Immigration Appeals (BIA). To complete this form, fill out all blanks below, including proof of service, which certifies that you will provide a copy of this form to the Department of Homeland Security (DHS). After filling in the blanks and signing both the declaration and proof of service, you must submit the form to the BIA Clerk's Office electronically, in person, or by mail. If submitting electronically, file in Respondent Portal at https://respondentaccess.eoir.justice.gov. Attorneys and fully accredited representatives submitting this form electronically must file in Case Portal at https://portal.eoir.justice.gov. If submitting by mail, follow the mailing instructions on Page 2. You must submit a separate copy of this form for each individual with an appeal pending before the BIA and whom the change of information affects.

You must file this form with the BIA within five working days of the change to your contact information. The BIA will send all official correspondence (e.g., notices, decisions) to the address you provide. The BIA will only make any change(s) to your contact information in EOIR's records upon receipt of this form; the BIA will not change your contact information based on different information on pleadings, motions, or other communications with the BIA. Note: Attorneys and fully accredited representatives who are representing a respondent before the BIA should not use this form to indicate their own change of address; such changes should instead be reflected on a Form EOIR-27 (Notice of Entry of Appearance as Attorney or Representative Before the Board).

My FORMER address and phone number	were:
"in care of" other person (if any)	
10874 NW 34th Court	
Number; Street; Apartment (if any)	
Coral Springs, FL 33065	
City, State, and ZIP code; Country (if other than U.S.	S.)
954-676-9788	
Phone Number (include country code if other than	U.S.)

Name - Last, First, Middle, Suffix (if applicable):

My CURRENT address and phone number a	re:
"in care of' other person (if any)	
135 W. 123rd Street, Apartment 1A	
Number; Street; Apartment (if any)	
New York, NY 10027	
City, State, and ZIP code; Country (if other than U.S.)	
954-676-9788	
Phone Number (include country code if other than U	.S.)

A-Number:

031-257-320

	for contained in this form is true and correct to the best of my known	
	Signature	Date
The property of the	PROOF OF SERVICE	
I, Olivia Abrecht (Name) to the Office of the Principal Legathe ICE e-service portal	, provided a copy of this Change of Address Form on,al Advisor for DHS Immigration and Customs Enforcement-ICE	04/11/2024 to the at:
By signing, I agree to provide a co Immigration and Customs Enforce electronically through the DHS eS	electronic/email service, or in-person or mail service (provide Number and Street, City, State, opp of this Change of Address Form to the Office of the Principal ement-ICE at the location I selected above. I understand that I can Service portal (register at https://eserviceregistration.ice.gov), or be	Legal Advisor for DHS a provide DHS with a copy either
No service needed. I am an ECA SIGN HERE X	AS-registered user who filed through the ECAS Case Portal. Signature	4/9/2024

File No.: A031-257-320 Robert Savio Panton

PROOF OF SERVICE

	a copy of Respondent's Motion to Reopen to the U.S. at Office of the Principal Legal Advisor via the ICE e-
/s/ Olivia Abrecht	04/11/2024
Olivia Abrecht	Date